

SANTA MONICA MOUNTAINS CONSERVANCY

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SMMC
Agenda Item 17
01/28/08

August 26, 2002

Maya Zaitzevsky, Project Coordinator
Environmental Review Section
Department of City Planning
City of Los Angeles
200 North Spring Street, Room 763
Los Angeles, California 90012

Notice of Preparation Comments
Las Lomas Annexation Project, 23110 and 23500 The Old Road,
between Interstate 5, Highway 14, and Calgrove Boulevard,
unincorporated Newhall Area

Dear Ms. Zaitzevsky:

The proposed Las Lomas Annexation Project is located in what is commonly referred to as the Newhall Wedge (wedge). By all accounts, this wedge of land between Interstate 5 and State Route (SR) 14 holds the key to maintaining an adequate wildlife corridor between the San Gabriel and Santa Susana Mountains. The wedge is part of a biological "Missing Linkage" connecting these mountain ranges, one of several identified by hundreds of land managers and scientists as part of a statewide effort. The regional value of this inter-mountain range habitat linkage cannot be overstated. The subject 555-acre property comprises approximately 30 percent of the available habitat area within this wedge.

The Newhall Wedge is also the centerpiece of a regionally significant greenbelt that separates the Santa Clarita Valley from the San Fernando Valley. This greenbelt is fundamental to the scenic viewsheds on Interstate 5 and SR 14 through the Newhall and San Fernando-Fremont Passes, respectively.

The regional habitat linkage significance of the Newhall Wedge warrants its inclusion in Los Angeles County's *Significant Ecological Area Update Study 2000* as part of the proposed new Santa Clara River or Santa Susana Mountains Significant Ecological Areas (SEAs). Furthermore, over 75 percent of the undeveloped land in this triangle is of SEA quality with

high quality oak woodland and big-cone douglas fir elements.

The ultimate land uses within the subject property and the remainder of the Newhall Wedge will be the determinant of the ecological viability of the habitat linkage and the quality of the scenic corridor-greenbelt. Most conservation biologists would concur that the proposed project would result in significant, unavoidable, adverse impacts to this regional wildlife corridor. In order to provide adequate long-term protection to this area, the Conservancy recommends that the Draft Environmental Impact Report (DEIR) include the following information, analyses, and project alternatives.

To adequately disclose the ecological constraints on the property, and its contribution to the Newhall Wedge habitat block, the DEIR must address the carrying capacity of the wedge. For a San Gabriel Mountains to Santa Susana Mountains habitat linkage to function well, the wedge area must be able to provide a critical mass of permanently protected habitat for sub-populations of mule deer, bobcat, grey fox, American badger, and long-tailed weasel. It is acknowledged that the necessary level of study to definitively determine the minimum area for these species is beyond the scope of this DEIR. However, the DEIR must provide a thorough analysis using all the information currently available. For example the DEIR should include United States Geological Survey (USGS)-based maps that identify each sub-watershed unit, year-round water source, and woodland unit greater than one-half acre in the wedge. This description, on a USGS 1:24000 base map, should show the boundaries and owners of all legal parcels in the wedge and the development footprint of any proposed or approved projects. An aerial photo must be provided in the DEIR that shows the existing open space inside the wedge and to the west and east of the wedge. This must be provided so that a reviewer can fully understand the locations of existing open space habitat areas and connections that are available to wildlife on and around the site.

The constraints analysis must also address the potential build-out of other private properties within the wedge. Of particular concern to the Conservancy is the cumulative impacts to the habitat linkage from the proposed project and the nearby Gates-King Industrial Park subdivision being processed by the City of Santa Clarita. The carrying capacity analysis must consider the impact of multiple developments and their associated recreational, infrastructure, utility corridor, fuel modification, and general edge effect impacts.

Without a reasonable constraints and build-out scenario analysis in the DEIR, the document

must conclude that the proposed project, would result in unavoidable, significant, adverse impacts on the subject inter-mountain range habitat linkage.

Need for Numerous Project Alternatives

Mass grading on the site is incompatible with the constraints of this area. The DEIR must consider numerous, far less damaging alternatives. Only through the consideration of reduced project footprints can a functional regional habitat linkage possibly be provided through the subject property. A reduced project footprint is also necessary to provide large enough habitat areas to support subpopulations of target wildlife species. The alternatives must include tight, independent clusters of development. Specifically, all project alternatives must allow for project open space habitat areas to viably connect to proposed open space areas for the Gates-King Industrial Park subdivision, as well as continued access for wildlife through the Gavin-The Old Road wildlife undercrossing and the Weldon Canyon Overpass, at the top of Newhall Pass.

Specifically, the following alternative must be considered if there is to be any possibility of maintaining a functional wildlife linkage/habitat area. The project must be limited to a maximum of two entrances to The Old Road. The development should be limited to two clusters, that connect to The Old Road, but that *are not connected to each other by any roads*. These clusters should be located generally in the central portion of the site and the southern portion of the site. No development should be permitted north of the existing trailer park, and no development should be permitted 1,500 feet south of the trailer park. These siting considerations are essential to provide any chance of maintaining the viability of the Gavin -The Old Road wildlife undercrossing at the northern portion of the site.

In addition, in order to maximize the viability for wildlife movement of the Weldon Canyon Overpass at the southern portion of the site, a minimum of a 2,500-foot-wide unbroken swath of habitat must connect the open space to the east (near and within the Gates-King Industrial Park) to the Weldon Canyon Overpass. This 2,500-foot swath of habitat must logically follow existing topography to maximize movement and cover potential for medium and large-bodied mammals.

Any more development on the site than the proposed alternative above would guarantee that the immediate and long-term function of the inter-mountain wildlife linkage would be irretrievably compromised. Moreover, any combination of projects (i.e., the proposed Las Lomas annexation and the Gates-King Industrial Park) that grades more than 150 acres of the wedge will create an obstacle course for mammals in the wedge and will eliminate the

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viability of subpopulations, and maybe even species, for residing in the wedge.

A spur of the Rim of the Valley Trail courses across the Newhall Wedge from the Los Pinetos-SR 14 undercrossing to Interstate 5. The proposed project, and each of its DEIR alternatives, should analyze alignments for this trail and provide funding for its construction.

Dedication of Public Open Space

Because of the site's ecological sensitivity, any commercially viable project would result in unavoidable significant adverse ecological impacts. To partially mitigate these impacts, it is imperative that the City require all ungraded area to be dedicated to a public park agency. In addition, such a dedication must include easements in favor of the development entity to allow for privately funded fuel modification. A Landscape Maintenance District and Covenants, Codes, and Restrictions (CC&Rs) should be incorporated in the mitigation measures in the DEIR and in the conditions of approval to fund maintenance of the open space.

The value of open space in the Santa Clarita River watershed, in the greenbelt between Santa Clarita and Los Angeles, and in the connection between the Angeles National Forest and the Santa Clarita Woodlands is of State-wide significance. The most sound enduring public policy direction on the subject property is to maximize the permanent protection of these resources. We urge the City to incorporate numerous DEIR alternatives that would implement this public policy direction. The applicant's project objectives are incompatible with the site and must not totally drive the selection of alternatives.

Please direct any questions and all future correspondence to Judi Tamasi of our staff at the above address and by phone at (310) 589-3200, ext. 121.

Sincerely,

A handwritten signature in black ink, appearing to read "MICHAEL BERGER", with several overlapping strokes.

MICHAEL BERGER
Chairperson